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February 9, 2018

**VIA ECFS**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Attn: Wireline Competition Bureau

**Re: Notice of Consolidation of Commonly-Owned Study Areas in Iowa  
Titonka Telephone Company  
Iowa Study Area Codes 351510 and 351114  
CC Docket No. 96-45**

Dear Ms. Dortch:

On behalf of Titonka Telephone Company (“Titonka”), transmitted herewith is a notification letter informing the Commission that effective July 1, 2018, Titonka (study area code 351510) will consolidate its study area with that held by its wholly-owned subsidiary, The Burk Telephone Company (study area code 351114). The study area code for Titonka will be the surviving study area code. As further detailed in the notice letter, a Petition for Waiver of Sections 51.917(b)(1) and (b)(7) of the Commission’s rules is being filed contemporaneously with this submission.

Should you have any questions with respect to this matter, please feel free to contact the undersigned.

Respectfully submitted,

/s/ Tony S. Lee

James U. Troup  
Tony S. Lee

Counsel for Titonka Telephone Company and  
The Burt Telephone Company

Enclosure



# Titonka-Burt Communications

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Aaron McCartan  
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February 6, 2018

## VIA ECFS

Ryan Palmer, Chief  
Telecommunications Access Policy Division  
Wireline Competition Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: Notice of Consolidation of Commonly-Owned Study Areas  
Titonka Telephone Company  
Iowa Study Area Codes 351510 and 351114  
CC Docket No. 96-45**

Dear Mr. Palmer:

By this letter, Titonka Telephone Company ("Titonka") notifies the Federal Communications Commission ("FCC") that the company will consolidate two study areas in the state of Iowa. Titonka is an incumbent rural telephone company located in Titonka, Iowa. In 1984, Titonka purchased The Burt Telephone Company ("Burt Telephone"), which became a wholly-owned subsidiary of Titonka. The two companies operated adjacent study areas in Iowa together using the same personnel and equipment. On May 23, 2003, Titonka and Burt Telephone filed a joint application with the Iowa Utilities Board ("IUB") to dissolve Burt Telephone and operate as a single corporation. The IUB approved Titonka and Burt Telephone's application on June 20, 2003,<sup>1</sup> and Burt Telephone transferred all of its customers and assets to Titonka. The combined companies operate under the name Titonka-Burt Communications. Although the companies operate under a single company name, and Burt Telephone does not have any customers, operations, or assets as they were all transferred to Titonka as part of the transaction approved by the IUB in 2003, the study areas for Titonka (study area code 351510) and Burt Telephone (study area code 351114) have remained separate.

Titonka's board of directors has decided that the company should now formally combine the two study area. A study area waiver is not required to merge the two areas because the FCC has previously ruled that no study area waiver is required when commonly-owned affiliated companies are consolidating existing study areas in the same state.<sup>2</sup> However, contemporaneous

<sup>1</sup> In Re: Titonka Tel. Co. & the Burt Tel. Co., IUB Docket Nos. SPU-03-9, 2003 WL 24091760 (June 20, 2003).

<sup>2</sup> See Request for Clarification Filed by the National Exchange Carrier Association, Inc., and Petitions for Waivers Filed by Alaska Telephone Company, Ducor Telephone Company, and Kingsgate Telephone, Inc., Concerning the



# Titonka-Burt Communications

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with this notice, Titonka and Burt Telephone have filed a petition for waiver of Sections 51.917(b)(1) and 51.917(b)(7) of the Commission's rules to recalculate for the merged study areas the 2011 Instate Switched Access Revenue Requirement and 2011 Rate-of-Return Carrier Base Period Revenue necessary to determine Connect America Fund – Intercarrier Compensation support. Grant of the requested waivers is required by the National Exchange Carrier Association to enable the company to merge Burt Telephone's study area into Titonka's study area. The study area code consolidation will be effective on July 1, 2018, with the study area code for Titonka (SAC 351510) being the surviving study area code.

Should there be any questions with respect to this matter, please feel free to contact Titonka's FCC counsel, James U. Troup or Tony S. Lee, at (703) 812-0400.

Respectfully submitted,

Aaron McCartan  
General Manager  
Titonka-Burt Communications

cc: Alexander Minard, FCC  
Suzanne Yelen, FCC  
Victor Gaither, High Cost Program, USAC  
Carol Brennan, NECA